

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

\$103,342.22 in U.S. CURRENCY and  
\$4,468.18 in U.S. CURRENCY

)  
)  
) No. 05-10515-REK  
)  
)  
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)

**VERIFIED CLAIM**

**NOW COMES** Defendant Mohammed Abdul Rasheed Quaraishi (“Rasheed”) and hereby states that he has an interest in the \$103,342.22 in U.S. currency and \$4,468.18 in U.S. currency that is the subject of this action.

In support whereof, Rasheed states as follows:

1. Rasheed received a copy of the Verified Complaint for Forfeiture in Rem in this action on April 15, 2005. As far as Rasheed is aware, the Government has not published notice of this action.
2. On or about November 1, 2004, the Government sought – and Magistrate Judge Swartwood issued – a warrant, authorizing seizure of “the contents” of two numbered bank accounts maintained at Charter One Bank in Chicago, Illinois. These two accounts were a personal account in Rasheed’s name only (Acct. No. 08620398000) that contained \$4,468.18, and a corporate account in both Rasheed’s name and his company’s (MAQ Technologies, Inc., Rasheed’s computer consultant company (“MAQ”), of which Rasheed is sole principal) name (Acct. No. 08620008235) that contained \$103,342.22.

As such, the funds in those accounts belong to Rasheed. In addition, to the extent that it is necessary, Rasheed also hereby asserts an interest on behalf of MAQ.

3. The funds in both Rasheed's personal and corporate accounts were obtained from legitimate sources. The funds in Rasheed's corporate account were derived from checks from MAQ clients for work performed by MAQ, payroll tax refunds from Rasheed's payroll services company (Paychex), and loans, either from Rasheed, personal friends, or a bank, for the purpose of helping MAQ, a relatively new company, meet payroll. Likewise, all of the funds in Rasheed's personal account were derived from MAQ.

4. The Government has thus unlawfully seized these funds from Rasheed.

**WHEREFORE**, Rasheed respectfully requests that this Court dismiss this action against the \$103,342.22 in U.S. currency and \$4,468.18 in U.S. currency and provide any other relief that this Court may seem just and proper.

Respectfully submitted,  
MOHAMMED ABDUL RASHEED  
QUARAISHI  
By his attorneys,

/s/ Frank A. Libby, Jr.  
Frank A. Libby, Jr. (BBO No. 299100)  
Nicholas A. Klinefeldt (BBO No. 647422)  
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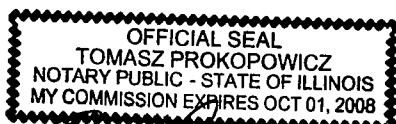
Dated: May 13, 2005


**VERIFICATION**

I, Mohammed Abdul Rasheed Quaraishi, have read the foregoing Verified Claim and declare, under oath and penalty of perjury, that it is true and correct to the best of my knowledge, information, and belief.

5/11/2005  
Date

  
Mohammed Abdul Rasheed Quaraishi



 5/11/05